

1 LESLIE MARK STOVALL, ESQ.
Nevada Bar No. 2566
2 ROSS MOYNIHAN, ESQ.
Nevada Bar No. 11848
3 STOVALL & ASSOCIATES
4 2301 Palomino Lane
Las Vegas, NV 89107
5 Telephone: (702) 258-3034
6 E-service: court@lesstovall.com
Attorney for Plaintiff
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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 RANDOLPH DAVILA, individually)
11) CASE NO.: 2:18-cv-02235-JAD-VCF
Plaintiff,)
12 vs.)
13 DEREK WOLFE, individually, DOES I-X)
14 and ROE CORPORATIONS I-X inclusive,)
15 Defendants.)

16 **PLAINTIFF'S UNOPPOSED MOTION TO EXTEND THE TIME FOR PLAINTIFF**
17 **TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR PROTECTIVE**
18 **ORDER FORBIDDING DISCLOSURE (SECOND REQUEST)**

19 COMES NOW Plaintiff, by and through his attorneys, STOVALL & ASSOCIATES, and
20 files this Motion to extend the time for plaintiff to file a response to defendant's motion for
21 protective order forbidding disclosure (ECF NO. 92). This is the second request for an extension
22 of time to oppose this motion. Defendant's motion was filed on September 21, 2020. Plaintiff's
23 response was initially due on October 5, 2020. On October 5, 2020, plaintiff filed his first motion
24 to extend time to October 19, 2020, which was granted by the court. Through this motion,
25 plaintiff requests an additional extension to November 19, 2020 to file the response. The reason
26 for the requested extension is that the parties are attempting to resolve the issues that exist in the
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1 defendant's motion. Defendant agrees to, and does not oppose, the extension of time requested in
2 this motion.

3 This motion is based upon the pleadings and papers on file herein, the Memorandum of
4 Points and Authorities attached hereto, and any oral argument this Court may entertain at the
5 hearing of this Motion.
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7 Dated this 19th day of October 2020.

8 STOVALL & ASSOCIATES

9 */s/ Ross Moynihan*

10 ROSS H. MOYNIHAN, ESQ.
11 Nevada Bar No. 11848
12 2301 Palomino Lane
13 Las Vegas, Nevada 89107
14 *Attorney for Plaintiff*

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18 **DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF MOTION**

19 ROSS MOYNIHAN, declares and states as follows:

20 1. I am an attorney at the Law Office of Stovall & Associates, counsel for Plaintiff,
21 and am licensed to practice law in the State of Nevada.

22 2. On September 21, 2020, Defendant filed a MOTION for Protective Order
23 Forbidding Disclosure of Privileged Information. ECF NO. 92.

24 3. Plaintiff's response to the motion was due on October 5, 2020 when plaintiff filed
25 an unopposed motion to extend time to file a response to October 19, 2020, and which the court
26 subsequently granted.
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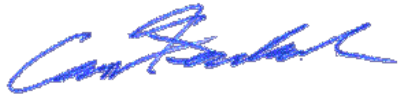
1 Based upon the declaration of counsel, plaintiff submits that good cause exists for the
2 extension of plaintiff's time to file his response to defendant's motion for protective from
3 October 19, 2020 to November 19, 2020.
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5 Dated this 19th day of October 2020.

6 STOVALL & ASSOCIATES

7 /s/ Ross Moynihan
8 ROSS H. MOYNIHAN, ESQ.
9 Nevada Bar No. 11848
10 2301 Palomino Lane
11 Las Vegas, Nevada 89107
12 *Attorney for Plaintiffs*

13 IT IS SO ORDERED.

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15 Cam Ferenbach
16 United States Magistrate Judge

17 10-20-2020

18 Dated: _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of October 2020, service of the foregoing PLAINTIFF'S MOTION TO EXTEND THE TIME FOR PLAINTIFF TO FILE A RESPONSE TO DEFENDANT'S MOTION FOR PROTECTIVE ORDER FORBIDDING DISCLOSURE was made this date through the court's electronic filing system to the following:

Richard A. Schnofeld, Esq.
CHESNOFF & SCHONFELD
520 South Fourth Street
Las Vegas, NV 89101
Email: rschonfeld@cslawoffice.net
Attorneys for Defendant

Matthew R. Giacomini, Esq.
Springer and Steinberg, P.C.
1600 Broadway Suite 1200
Denver, CO 80202
Email: mgiacomini@springersteinberg.com
Attorneys for Defendant

/s/ Ross Moynihan
An employee of STOVALL & ASSOCIATES